

ADVANCED CODING TECHNOLOGIES LLC,	§	Case No. 2:24-cv-00572-JRG
	§	(LEAD CASE)
Plaintiff,	§	<u>JURY TRIAL DEMANDED</u>
v.	§	
APPLE INC.,	§	
Defendant.	§	
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ADVANCED CODING TECHNOLOGIES LLC,	§	Case No. 2:24-cv-00687-JRG
	§	(MEMBER CASE)
Plaintiff,	§	<u>JURY TRIAL DEMANDED</u>
v.	§	
APPLE INC.,	§	
Defendant.	§	

1. I have personal knowledge of the facts set forth in this declaration. I am competent to testify as to all matters stated, and I am not under any legal disability that would in any way preclude me from testifying.

2. I am a Partner at the law firm of Fabricant LLP and counsel of record for Plaintiff Advanced Coding Technologies LLC in this matter.

3. The exhibits attached to this declaration may contain annotations and/or excerpts of the originals.

4. Attached hereto as Exhibit 14 is a true and correct copy of a Memorandum Opinion and Order, Dkt. 76, in *AGIS Software Development LLC v. Apple, Inc.*, Case No. 2:17-cv-00516-JRG (E.D. Tex. June 6, 2018).

5. Attached hereto as Exhibit 15 is a true and correct copy of a Redacted Sealed Order Granting Defendant's Motion to Transfer, Dkt. 149, in *RFCyber Corp. v. Apple Inc.*, Case No. 6:21-cv-00916-ADA (W.D. Tex. June 14, 2023).

6. Attached hereto as Exhibit 16 is a true and correct copy of an Order, Dkt. 60, in *Jawbone Innovations, LLC v. Amazon.com, Inc., et al.*, Case 2:21-cv-00435-JRG (E.D. Tex. Sept. 21, 2022).

7. Attached hereto as Exhibit 17 is a true and correct copy of a screen shot from Official USA of a public record for Zhongli He.

8. Attached hereto as Exhibit 18 is a true and correct copy of pages from Qualcomm / Company / Offices showing 73 Offices in USA.

9. Attached hereto as Exhibit 19 is a true and correct copy of pages from Broadcom / Company / Contact Us showing Offices in USA.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 16, 2024 in Short Hills, New Jersey.

/s/ Peter Lambrianakos
Peter Lambrianakos